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April 28, 2022

Via ECF

The Honorable Judge Lewis J. Liman, U.S.D.J.
Daniel Patrick Moynihan
United States Courthouse
500 Pearl St.
New York, NY 10007-1312

**RE: Sharon Joyner Individually, and On Behalf of All Others Similarly Situated, vs.
Simplyworkout
U.S. District Court, S.D.N.Y., Civ. Action No.: 1:22-cv-02422-LJL**

Dear Honorable Lewis J. Liman:

I represent Defendant Simplyworkout (“Defendant”) in the above-referenced matter. I write pursuant to Section 1 (A) of Your Honor’s Individual Rules of Practice in Civil Cases to request a 30-day extension of time to May 30, 2022, for Defendant’s Response to Plaintiffs’ Complaint in the matter. The original date to respond to the complaint is April 29, 2022.

We have conferred with Plaintiffs’ counsel, and they consent to our request for an extension. The extension is needed to analyze and/or investigate the matters set forth in the Complaint, confer with our client, explore settlement, and, if necessary, prepare a response. No previous requests for an extension of time to respond have been made in this case. The requested extension does not affect any other scheduled dates.

Respectfully submitted,

By: /s/ Deyuan Lin
Deyuan Lin

CC: Edward Y. Kroub, Esq. (via ECF)